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Attorneys for Plaintiffs  
SCHAECHTER ACQUISITIONS, INC.  
AND PHILIP SCHAECHTER

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

SCHAECHTER ACQUISITIONS, INC., a Nevada corporation, and PHILIP SCHAECHTER, an individual,

### **Plaintiffs.**

GEORGE HEIN, Individually and  
Doing Business As "PROTEACHER",  
and PROTEACHER.

## Defendants

Case No. 10-cv-4372 CRB

**STIPULATION AND [PROPOSED] ORDER  
REGARDING CASE MANAGEMENT  
CONFERENCE**

This Mutual Stipulation is hereby entered into between Plaintiffs Schaechter Acquisitions, Inc. and Philip Schaechter and Defendants George Hein and ProTeacher (collectively, the “Parties”) by their respective counsel pursuant to Local Rule 7-12. Counsel for Defendants hereby appears special, and without waiver of any rights to object to the Complaint, for purposes of this Stipulation only.

## RECITALS

A. On October 15, 2010, the Parties entered into a written Tolling Agreement in order to facilitate ongoing settlement negotiations between them in order to resolve this matter.

- B. The tolled period of the Tolling Agreement expires on January 13, 2011.
- C. The Tolling Agreement states that Defendants George Hein and ProTeacher will accept service of process of the Complaint through counsel at the end of the tolled period;
- D. Accordingly, the Parties hereby agree as follows:

## **STIPULATION**

1. The Parties respectfully request the court continue the Case Management Conference currently set for January 14, 2011 until March 18, 2011 in order to allow them time finalize, if possible, their settlement discussions, to serve the Complaint, to respond to the Complaint, and to meet and confer on all topics related to the Case Management Conference.

IT IS SO STIPULATED.

Dated: January 4, 2011

COMPUTER LAW GROUP LLP

By: /s/ Jack Russo  
Jack Russo  
Christopher Sargent

Attorney for Plaintiffs  
SCHAECHTER ACQUISITIONS, INC. AND  
PHILIP SCHAECHTER

Dated: January 4, 2011

TURNER BOYD LLP

By: /s/ Julie Turner  
Julie Turner

Appearing Specially on Behalf of  
**GEORGE HEIN**

I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Julie Turner.

/s/ Jack Russo  
Jack Russo

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
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3 Dated: January 06, 2011  
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